

Jonathan H. Blavin (State Bar No. 230269)
Jonathan.Blavin@mto.com
MUNGER, TOLLES & OLSON LLP
560 Mission Street, 27th Floor
San Francisco, CA 94105-3089
Telephone: (415) 512-4000
Facsimile: (415) 512-4077

Victoria A. Degtyareva (State Bar No. 284199)
Victoria.Degtyareva@mto.com
MUNGER, TOLLES & OLSON LLP
350 South Grand Avenue, 50th Floor
Los Angeles, CA 90071-3426
Telephone: (213) 683-9100
Facsimile: (213) 687-3702

Attorneys for Defendant Snap Inc.

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

MDL No. 3047

Case No. 4:24-cv-01382-YGR

This Document Relates to:

*Tucson Unified School District v. Meta
Platforms Inc., et al.*

**DECLARATION OF VICTORIA A.
DEGTYAREVA IN SUPPORT OF
DEFENDANTS' REPLY IN SUPPORT
OF MOTION FOR SUMMARY
JUDGMENT (TUCSON) (SD MSJ NO. 2)**

Judge: Hon. Yvonne Gonzalez Rogers
Magistrate Judge: Hon. Peter H. Kang

Date: January 26, 2026
Time: 8:00 a.m.
Place: Courtroom 1, 4th Floor

DECLARATION OF VICTORIA A. DEGTYAREVA

I, Victoria A. Degtyareva, declare:

1. I am an attorney at the law firm of Munger, Tolles & Olson LLP and one of the counsel of record representing Defendant Snap Inc. (“Snap”) in the above-captioned matter. I am admitted to practice before all of the courts of the State of California and this Court. I have personal knowledge of the facts stated in this declaration, and if called upon to do so, could and would competently testify thereto.

2. I submit this declaration in support of Defendants’ Reply in Support of Motion for Summary Judgment as to Plaintiff Tucson Unified School District (“Tucson”), filed concurrently with this declaration.

3. Attached as **Exhibit 1** is a true and correct copy of Tucson’s Governing Board Policy titled “Student Use of Cell Phones and Other Electronic Devices” and dated September 16, 2025. The policy is available on Tucson’s website at <https://govboard.tusd1.org/Policies-and-Regulations/Policy-Code-JICJ>.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct.

Executed on December 5, 2025.

By: /s/ Victoria A. Degtyareva
VICTORIA A. DEGTYAREVA

EXHIBIT 1

<p style="text-align: center;">TUCSON UNIFIED SCHOOL DISTRICT</p> <p style="text-align: center;">GOVERNING BOARD POLICY</p>	POLICY TITLE: Student Use of Cell Phones and Other Electronic Devices
	POLICY CODE: JICJ

For purposes of this policy, “electronic devices” include, but are not limited to, cell phones, Mp3 players, iPods, personal digital assistants (PDA’s), e-book readers, compact disc players, portable game consoles, cameras, digital scanners, lap top computers, tablet computers and other electronic or battery powered instruments which transmit voice, text, or data from one person to another.

Students may possess and use cellular telephones and/or other electronic signaling devices subject to limitations of this and other policies of the District under the following conditions and guidelines:

- Cell phones and/or electronic devices are to be kept out of view in a student’s locker, pocket, or a carrying bag.
- The use of such devices shall be limited when students are at school, including during meals, passing periods, and recess, except under the following circumstances:
 - On or off campus before or after school;
 - During lunch for high school students only;
 - The use is for educational purposes, as directed by the student’s teacher;
 - There is an emergency- including a medical emergency or school-designated emergency, such as a lockdown or fire;
 - Following a school state of emergency; the school principal or designee may allow contact with parents for a designated time period;
 - The student needs to use the device because the student has a documented medical condition; or
 - If a teacher/coach approves the use during extended trips and sporting events.
- Unless subject to one of the above exceptions, cell phones and electronic signaling devices may NOT be used:
 - during instructional classroom time, including assemblies or other activities, which take place during the regularly scheduled classroom periods;
 - during passing periods or recess;
 - during elementary and middle school students’ lunch periods, unless an administrative approval has been obtained;

- on field trips or excursions conducted during the normal school day and during regular classroom instructional hours;
 - to take pictures or recordings at any time that violate personal privacy, as set forth in Governing Board Policy ABB; or
 - for cheating.
- The principal shall establish additional guidelines appropriate to campus needs. Such guidelines shall include procedures for a student's parent to contact the student during the school day and procedures for a student to contact their parent during the school day.
- Students violating the policy may have the electronic device confiscated and be subject to disciplinary action. Reasonable efforts will be taken to secure property that has been confiscated; however, neither the School District nor the School District Staff is responsible for loss, damage, or theft of any electronic device including but not limited to cell phones, laptops, tablet computers, portable media player brought to school, even if loss, damage or theft results from the device being confiscated.
- Any search of the contents of an electronic device shall be by an administrator. An administrator may only search an electronic device if they have reasonable suspicion that the device contains evidence of a violation of the TUSD Student Code of Conduct. Any such search must be limited in scope to the portion of the device (i.e., the phone app, file folder, photo gallery, etc.) in which there is reasonable suspicion to believe the evidence is contained. Administrators may not search an electronic device where the only suspected violation is the improper possession of the device.

At the beginning of each school year, each school shall notify its parents of this policy, and any school procedures required under this policy.

Adopted: June 21, 2005
Revised: July 24, 2012
Revised: August 23, 2022
Revised: September 16, 2025

LEGAL REF.: A.R.S. § 15-120.05

CROSS REF:

[JB – Equal Education Opportunities – Anti-Harassment](#)
[JICJ-R Use of Cell Phones and Other Electronic Signaling Devices Regulation](#)
[JIH – Student Interviews, Searches and Arrests](#)